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MEMO ENDORSED

5 June 2014

Stephen A. Katz (MA, NY & PA)

Honorable Nelson S. Roman
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: Hutter v. Countrywide Bank, N.A., Civil Action no. 09-CIV-10092 (NSR) (LMS)

Dear Judge Roman:

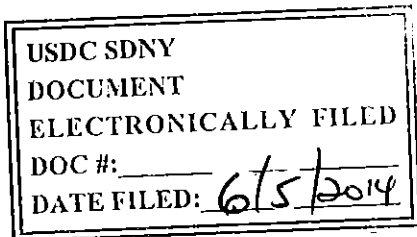
I am counsel for the plaintiff Nance M. Hutter, and I am writing concerning the motion for Rule 11 sanctions that defendant Countrywide Bank, N.A. has made. Mrs. Hutter and I request the Court's permission to submit a fifty-three-page legal memorandum in opposition to Countrywide's motion.

Hutter requests the extra space beyond the Court's standard twenty-five-page limit for an opposition memorandum, for three reasons. First, it seems to require less space for Countrywide to challenge one of Hutter's allegations than it does for Hutter to defend herself. And Countrywide challenges eight allegations that Hutter has made either in her claim under New York's Deceptive Practices Act¹ or in her pending motion to amend. So Hutter needs sufficient space to refute Countrywide's eight challenges.

Second, Hutter's proposed memorandum describes the facts of some Rule 11 cases, to give the reader a feel for when courts have and have not imposed Rule 11 sanctions. Although each case's facts are different, patterns emerge when you examine various Rule 11 cases, so Hutter's memorandum tries to convey that.

Finally, given that Countrywide's Rule 11 motion can potentially do great financial and professional harm to Mrs. Hutter and me, we would appreciate having the extra space to defend ourselves.

Thank you for your consideration.



Plaintiff's request is Granted
to the limited extent of
permitting a 27 page
Memorandum (Any page beyond stated limit
will be excluded from consideration)
Dated: June 5, 2014
White Plains, NY

¹ N.Y. GEN. BUS. LAW §§ 349 to 350-e (McKinney 2004).

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Honorable Nelson S. Roman
5 June 2014
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Sincerely yours,


Stephen A. Katz

cc: To all counsel by fax